



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



MAR 13 2014

Mr. Don Dorman
City of Tulare Wastewater Plant
1875 S. West Street
Tulare, CA 93274

**Re: Notice of Minor Title V Permit Modification
District Facility # S-548
Project # S-1140143**

Dear Mr. Dorman:

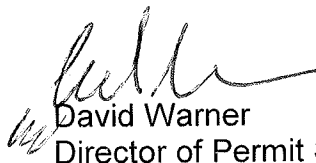
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to modify Permit(s) to Operate (PTOs) S-548-20 of the facility's current Title V operating permit. The project is to clarify and correct conditions relating to the number of retention ponds and the facility throughput limitations.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V PTO(s) S-548-20-4, application, and previous Title V permit. This project will be finalized after the 45-day EPA comment period.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Thank you for your cooperation in this matter.

Sincerely,



David Warner
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1140143

Engineer: Dan Klevann
Date: March 6, 2014

Facility Number: S-548
Facility Name: City of Tulare
Mailing Address: 1875 S West Street
Tulare, CA 93274

Reviewed by ASUR AQE

MAR 06 2014

Contact Name: Don Dorman
Phone: 559-684-4200

Responsible Official: Don Dorman
Title: City Manager

I. PROPOSAL

City of Tulare Wastewater Plant (Tulare) is proposing a Title V minor permit modification to clarify and correct some conditions on previously issued ATC's S-548-20. The wastewater facility has 8 retention/percolation ponds. In previous applications the retention/percolation ponds were identified as ponds 3-10. There was no reference to ponds 1 and 2. The facility states that they never had 10 ponds, only 8. The other modification is that the facility previously in project S-1100193 had applied to increase the allowable throughput of the facility to 8 million gallons per day (MGD) domestic and 12 MGD industrial. The domestic throughput was included on the permit. However, the industrial value was left off the permit. This project will add the industrial throughput value onto the permit. There is no increase in emissions from either of these changes as they have been previously approved.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

1875 S West Street
Tulare, CA 93274

III. EQUIPMENT DESCRIPTION

**S-548-20-4: EIGHT WASTEWATER TREATMENT
RETENTION/PERCOLATION PONDS**

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Tulare is proposing to correct the number of percolation ponds listed on the permit to the actual number of 8 ponds. They are also proposing to list the allowable throughput of wastewater for both the domestic and industrial portion of the facility. These changes are corrections to the permit, not a change in the method of operation for the facility. The original application for the facility listed each of the percolation ponds. The ponds were numbered with an internal numbering system. There were only 8 ponds listed on the application. The ponds were numbered as units 3-10. Correcting the number of ponds listed on the permit is not a modification. Additionally, in a separate application, the facility requested an expansion of the facility to up to 8 MGD domestic and 12 MGD industrial throughput. The domestic amount was listed on the ATC, but the industrial amount was omitted. The facility wants to have both of the throughputs explicitly listed on the permit so that there is no question when inspectors visit the facility. ATC S-548-20-2 issued 8/2/10 had the domestic throughput listed but not the industrial throughput. This ATC was not converted because the facility questioned the number of percolation ponds listed on the permit.

S-548-20-4:

Permit condition 1 was removed from the current Permit to Operate. This condition refers to the -0 permit for the facility. The additional conditions being

placed on the permit will be the applicable requirements. Condition 1 was replaced with the general condition to specify that the the permit shall not cause a public nuisance.

Permit conditions 2 and 3 were added to the proposed Permit to Operate to clearly identify the allowed facility wastewater throughputs.

Permit condition 4 was added to quantify the VOC emission from the ponds.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

City of Tulare
Facility # S-548
Project # S-1140143

2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. S-548-20-4
- B. Application
- C. Previous Title V Operating Permit S-548-20-2

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(S-548-20-4)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-548-20-4

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

EIGHT WASTEWATER TREATMENT RETENTION/PERCOLATION PONDS

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Daily average domestic wastewater throughput shall not exceed 8 million gallons per day. [District Rule 2201]
Federally Enforceable Through Title V Permit
3. Daily average industrial wastewater throughput shall not exceed 12 million gallons per day. [District Rule 2201]
Federally Enforceable Through Title V Permit
4. VOC emissions shall not exceed 5.3 lb VOC per day. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT B

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org

S-548-20-4



HEALTHY
AIR
LIVING

JAN 14 2014

SJVAPCD
Southern Region

Permit Application For:

- ☐ AUTHORITY TO CONSTRUCT (ATC) - New Emission Unit
☒ AUTHORITY TO CONSTRUCT (ATC) - Modification Of Emission Unit With Valid PTO/Valid ATC
☐ AUTHORITY TO CONSTRUCT (ATC) - Renewal of Valid Authority to Construct
☐ PERMIT TO OPERATE (PTO) - Existing Emission Unit Now Requiring a Permit to Operate

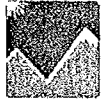
1. PERMIT TO BE ISSUED TO: CITY OF TULARE	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>1875 S. WEST STREET</u> CITY: <u>TULARE</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93274</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>1875 S. WEST STREET</u> CITY: <u>TULARE</u> <u>74</u> SECTION <u>16</u> TOWNSHIP <u>20</u> RANGE <u>24</u>	WITHIN 1,000 FT OF A SCHOOL? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. GENERAL NATURE OF BUSINESS: MUNICIPAL WASTEWATER TREATMENT PLANT	S.I.C. CODE(S) OF FACILITY (If known): <u>4952</u>
5. TITLE V PERMIT HOLDERS ONLY: Do you request a COC (EPA Review) prior to receiving your ATC <input type="checkbox"/> YES If yes, please complete and attach a Compliance Certification form (TVFORM-009)? <input checked="" type="checkbox"/> NO	
6. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (Please include Permit #'s if known, and use additional sheets if necessary) MODIFY EFFLUENT PONDS FROM 10 DOWN TO 8 AND INCREASE THE MAXIMUM THROUGHPUT FOR DOMESTIC AT 5.2 MGD AND INDUSTRIAL AT 12 MGD. EQUIPMENT INSTALLATION or MODIFICATION DATE: <u>12/2009</u>	
7. ERMIT REVIEW PERIOD: Do you request a three- or ten-day period to review the draft Authority to Construct permit? Please note that requesting a review period will delay issuance of your final permit by a corresponding number of working days. See instructions for more information on this review process. P <input type="checkbox"/> 3-day review <input type="checkbox"/> 10-day review <input checked="" type="checkbox"/> No review requested	
8. HAVE YOU EVER APPLIED FOR AN ATC OR PTO IN THE PAST? <input checked="" type="checkbox"/> YES If yes, ATC/PTO #: <u>S-548-20-2</u> <input type="checkbox"/> NO	Optional Section 11. DO YOU WANT TO RECEIVE INFORMATION ABOUT EITHER OF THE FOLLOWING VOLUNTARY PROGRAMS? <input type="checkbox"/> "HEALTHY AIR LIVING (HAL) BUSINESS PARTNER" <input type="checkbox"/> "INSPECT"  
9. IS THIS APPLICATION FOR THE CONSTRUCTION OF A NEW FACILITY? <input type="checkbox"/> YES If "Yes", please complete the CEQA Information form. <input checked="" type="checkbox"/> NO If "No", is the proposed equipment or project allowed: - by the current Conditional Use Permit or other Land Use Permit? <input type="checkbox"/> YES <input type="checkbox"/> NO - or by Right? <input type="checkbox"/> YES <input type="checkbox"/> NO	
10. IS THIS APPLICATION SUBMITTED AS THE RESULT OF EITHER A NOTICE OF VIOLATION OR A NOTICE TO COMPLY? <input checked="" type="checkbox"/> YES If yes, NOV/NTC #: <u>5007633</u> <input type="checkbox"/> NO	
12. TYPE OR PRINT NAME OF APPLICANT: DON DORMAN	TITLE OF APPLICANT: CITY MANAGER
13. SIGNATURE OF APPLICANT: <u>City of Tulare</u> <u>By Don Dorman</u>	DATE: <u>1/14/2014</u> PHONE #: <u>559.684.4200</u> CELL PHONE #: FAX #: <u>559.685-8688</u> E-MAIL: <u>ddorman@ci.tulare.ca.us</u>

FOR APCD USE ONLY:

DATE STAMP:	FILING FEE RECEIVED: \$ _____ CHECK #: _____
DATE PAID: _____	PROJECT #: <u>S-1140143</u> FACILITY ID: <u>S-548</u>

Northern Regional Office * 4800 Enterprise Way * Modesto, California 95356-8718 * (209) 557-6400 * FAX (209) 557-6475

ATC



San Joaquin Valley
Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ SIGNIFICANT PERMIT MODIFICATION
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE
AMENDMENT

COMPANY NAME: <u>City of Tulare</u>	FACILITY ID: <u>-</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>City of Tulare</u>	
3. Agent to the Owner: <u>Don Dorman, City Manager</u>	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☒ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☒ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

City of Tulare
By Don Dorman
Signature of Responsible Official

2/6/2014
Date

Don Dorman
Name of Responsible Official (please print)

City Manager
Title of Responsible Official (please print)

ATTACHMENT C

Previous Title V Operating Permit No.
S-548-20-2

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-548-20-3

EXPIRATION DATE: 11/30/2016

EQUIPMENT DESCRIPTION:

TEN WASTEWATER TREATMENT RETENTION/PERCOLATION PONDS

PERMIT UNIT REQUIREMENTS

1. See Facility-wide requirements for conditions applicable to this permit unit. [District Rule 2080] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.